



City of Seattle

Edward B. Murray, Mayor

Seattle City Light

Jorge Carrasco, General Manager and CEO

July 9, 2014

Bonneville Power Administration (via Techforum@bpa.gov)

PEAK and WECC Cost Recovery Allocation

To whom it may concern:

Thank you for soliciting customer comments on the proposed PEAK and WECC cost recovery allocations. Seattle City Light (Seattle) appreciates the opportunity to comment and supports a cost recovery allocation methodology based on cost causation.

PEAK Cost Recovery

Seattle supports BPA's first proposal to recover costs from load serving entities based proportionately on net energy for load. Additionally, to avoid Transmission Operators being subject to double billing (billing from both BPA and PEAK for the same service), Seattle suggests that BPA credit Transmission Operator's PEAK charges (billings directly from PEAK) against any BPA PEAK charges allocated to a Transmission Operator.

WECC Cost Recovery

BPA is proposing to change its WECC billing election from WECC billing each load serving entity within BPA's BA individually, to WECC billing BPA as a BA, based on its net energy for load. Seattle supports BPA's desire to change its election to a less administratively burdensome billing method, attendant with its approach to allocate costs to load serving entities within its BA. Seattle urges BPA to use cost causation principles as the foundation for its cost recovery methodology for the portion of WECC costs which are attributable to station service and other loads that are not directly attributable to a load service entity.

Seattle greatly appreciates the opportunity to submit comments on this issue. Should you have any questions regarding these comments, please don't hesitate to contact me at (206) 386-4537 or sarah.davis@seattle.gov.

Respectfully submitted,

Sarah Davis
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Seattle City Light